

Defendant's motion to amend his conditions of supervised release to permit him to travel outside this Court's jurisdiction for work purposes only is granted. The defendant shall abide by the terms and conditions the supervising officer deems necessary and appropriate.

So Ordered.

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
WESTERN DIVISION**

James G. Carr
Sr. U.S. District Judge

UNITED STATES OF AMERICA,
Plaintiff,

Vs.

MOHAMMAD ZAKI AMAWL, et.al.
Defendant.

) Case No. 3:06-CR-00719

) Judge JAMES G. CARR

) **DEFENDANT MARWAN**
) **OTHMAN EL-HINDI'S**
) **MOTION TO PERMIT**
) **TRAVEL FOR EMPLOYMENT**

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) **MARWAN OTHMAN EL-HINDI**

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Now comes Defendant Marwan Othman El-Hindi to respectfully request that this Court amend the terms and conditions of his Supervised Release by permitting him to travel out of state as a driver for Moxie Transportation Inc. This travel would be from Toledo, Ohio to regional customers in the states of; Ohio, Michigan, Illinois, Indiana, Iowa, Tennessee and Kentucky.

Marwan was released to a Toledo half-way house after serving almost twelve years of incarceration. He has now secured housing in a mobile home in the Toledo area where he lives alone. His rent and living expenses have largely been paid for by family and friends since Marwan has had no success in securing employment. Not surprisingly, most employers refuse to hire a person whose felony conviction was for a terrorism related offense. When Marwan discloses the conviction, he is shown the door.

This employment opportunity is with a company that is owned and operated by an individual who has gotten to know Marwan personally through the local mosque Marwan has been attending. Such opportunities for employment are few and far between. Marwan wants to work in order to financially support himself and his family, not to mention that gainful employment is the only way he will ever be able to pay the restitution that he was ordered to pay. He has been very successful while on supervised release. Mr. El-Hindi wants to demonstrate that he can be further be trusted to use the requested modification for his post-conviction rehabilitation and the betterment of the community.

The attached email from Moxie Transportation, Inc., clearly articulates the offer for employment. See Exhibit A

WHEREFORE, Defendant Marwan Othman El-Hindi hereby requests that this Court amend his conditions of supervised release to permit him to travel outside this Court's jurisdiction for work purposes, and that the travel be permitted throughout the states of Ohio, Michigan, Indiana, Illinois, Iowa, Kentucky and Tennessee.

Respectfully submitted,

/s/ Stephen D. Hartman

By: Stephen D. Hartman

Attorney for Defendant
Marwan Othman El-Hindi

CERTIFICATE OF SERVICE

The undersigned hereby certifies that **DEFENDANT MARWAN OTHMAN EL-HINDI MOTION TO PERMIT TRAVEL FOR WORK PURPOSES** was filed electronically this 31st day of July, 2018. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic receipt. Any parties not on said receipt will be served by regular U.S. Mail. Parties may access this filing through the Court's system.

Respectfully submitted,

/s/ Stephen D. Hartman

Attorney for Defendant
Marwan Othman El-Hindi